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July 28, 2003

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APPLICATION

Honorable James H. Welsh
Commissioner of Conservation
P. O. Box 94275
Baton Rouge, LA 70804

Re: Robulus L Zone, Reservoir A
Southwest Lake Boeuf Field
Lafourche Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **POGO PRODUCING COMPANY**, for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of orders pertaining to the following matters relating to the **Robulus L Zone, Reservoir A**, in the Southwest Lake Boeuf Field, Lafourche Parish, Louisiana:

1. To dissolve the existing ROBU L RA SUA adopted by Office of Conservation Order No. 473-K, and simultaneously therewith, to create a revised drilling and production unit, such revised unit being designated ROBU L RA SUA and being depicted on the attached plat;
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed revised unit with each separate tract sharing in unit production on a surface acreage basis of participation;

3. To extend to the proposed revised unit, except to the extent they are in conflict herewith, all pertinent provisions of Office of Conservation Order No. 473-K, effective September 25, 2001;
4. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The Robulus L Zone, Reservoir A, in the Southwest Lake Boeuf Field, was previously defined in Office of Conservation Order No. 473-K, effective September 25, 2003.

A conference to discuss the proposed application and any opposition thereto was held at 2:30 p.m. on Tuesday, July 8, 2003, at The Onebane Law Firm, 102 Versailles Blvd., Suite 600, Lafayette, Louisiana 70502, (337)237-2660. A list of the parties who attended the pre-application conference is attached. Randall Songy, attorney for the applicant, opened the conference with a brief discussion of the Rules of Procedure. David Comeaux, geological consultant for the applicant, explained the applicant's proposal and the geological, engineering and other bases therefor, and answered questions. Paul Perret, representing Laurel Valley Plantation, presented five different counter plans, one with geographic boundaries and four with geologic boundaries. Ray Landeche, representing the Landeche family, presented two different counterplans. A.T. Green, representing Libby & Blouin, presented a counterplan with geologic boundaries. Jim Veazey, representing the Devillier Estate, presented a counterplan with geographic boundaries. Discussions were had at the conference attempting to resolve the differences, but were unsuccessful. The conference was then adjourned.

Further discussions after the conference attempting to resolve the differences of the parties have likewise been unsuccessful.

Pertinent data relating to the proposed application can be obtained, AT THE COST OF THE REQUESTING PARTY, by contacting **David Comeaux, Leon Comeaux & Associates, P.O. Box 53922, Lafayette, Louisiana 70505, (337) 233-9839.**

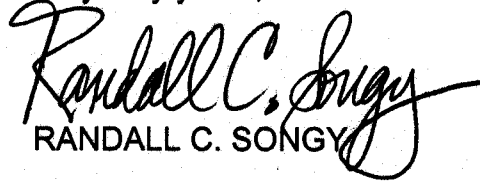
There is attached hereto and made a part hereof a plat outlining the proposed unit and a list of the names and addresses of the interested parties to whom this unitization proposal is being sent. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished ONLY to the Commissioner of Conservation. However, the list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

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Finally, there is enclosed a check in the amount of \$755.00, made payable to the Louisiana Office of Conservation, in payment of the required hearing application fee.

Very truly yours,


RANDALL C. SONGY

RCS/elg/bad

Enclosures

- cc: Mr. Richard Hudson, District Manager
Office of Conservation
- cc: All Interested Owners, Interested Parties and
Represented Parties

T 15 S
R 17 E

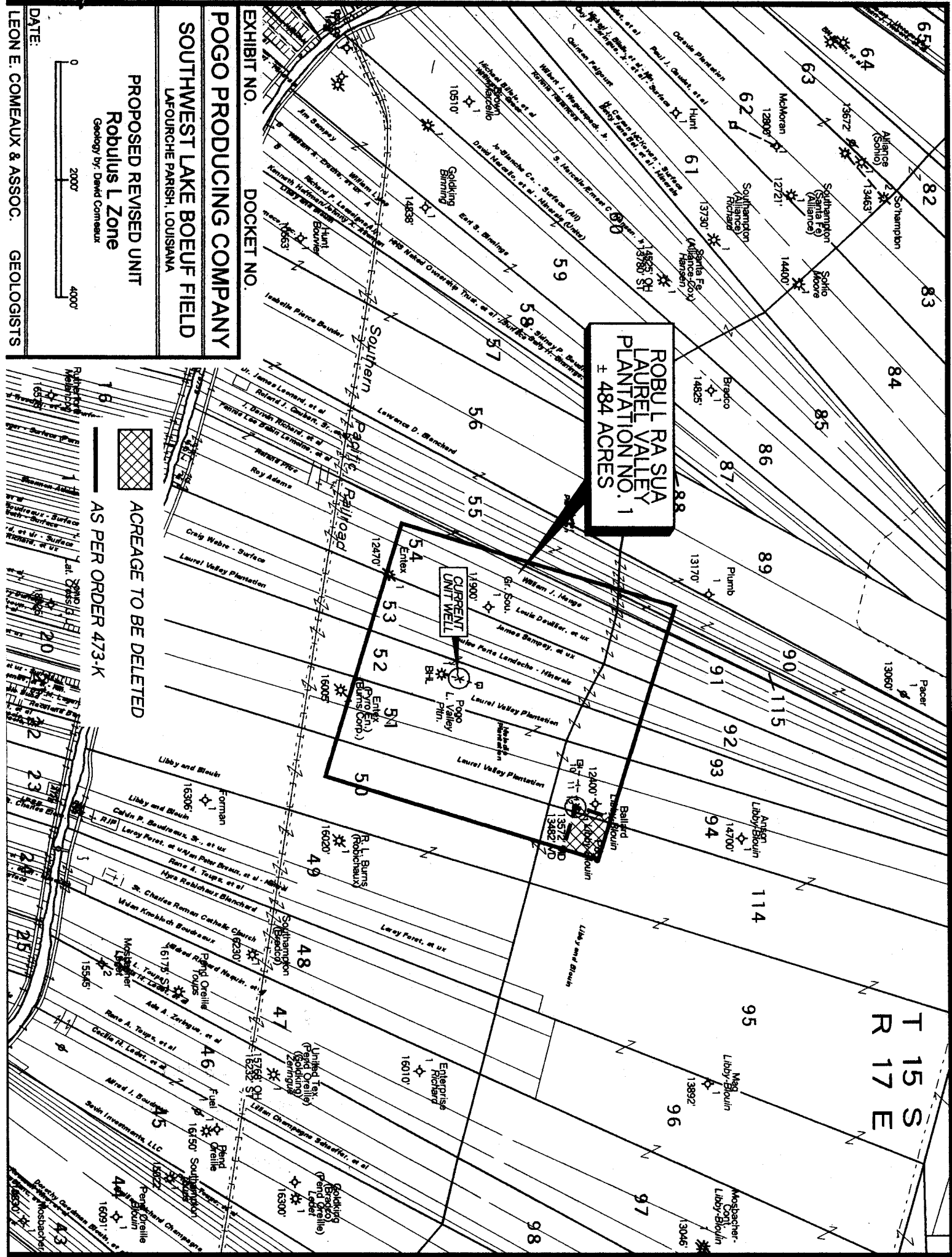
ROBUL RA SUA
LAUREL VALLEY
PLANTATION NO. 1
± 484 ACRES

EXHIBIT NO. DOCKET NO.

POGO PRODUCING COMPANY
SOUTHWEST LAKE BOEUF FIELD
LAFOURCHE PARISH, LOUISIANA

PROPOSED REVISED UNIT
Robulus L Zone
Geology by: David Comeaux

ACREAGE TO BE DELETED
AS PER ORDER 473-K



DATE: LEON E. COMEAUX & ASSOC. GEOLOGISTS